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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROSEN MARIANO, an individual,

Plaintiff,

vs.

THE CITY OF LAS VEGAS, a political
subdivision of the State of Nevada;
CORRECTIONAL HEALTHCARE
COMPANIES, INC., a foreign corporation;
CORRECT CARE SOLUTIONS, LLC, a foreign
limited liability company; MICHELE
FREEMAN, Chief of Detention Enforcement for
the City of Las Vegas; CORRECTION OFFICER
DOE 1-10; HEALTHCARE WORKER DOES
11-20; DOES 21-99; inclusive; ROE
CORPORATIONS 100-199, inclusive,

Defendants.

CASE NO.: 2:18-CV-01911-APG-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
PLAINTIFF ROSEN MARIANO'S
RESPONSE TO DEFENDANT CORRECT
CARE SOLUTIONS, LLC'S RENEWED
MOTION FOR SUMMARY JUDGMENT**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, between the Parties, by and through their
respective counsel of record, that the deadline for Plaintiff Rosen Mariano to file his response to
Defendant Correct Care Solutions, LLC's Renewed Motion for Summary Judgment (ECF No. 92) will



1 be extended ten (10) days from February 10, 2023 to February 20, 2023. The Motion was filed on
 2 January 20, 2023. Defendant Correct Care Solutions, LLC's reply in support of the Motion will also
 3 be extended ten (10) days from February 24, 2023 to March 6, 2023. This is the Parties' first request
 4 to extend time. This Stipulation and [Proposed] Order is submitted in accordance LR IA 6-1.

5 The Parties respectfully request this brief extension of time to accommodate Plaintiff's
 6 counsel. Specifically, Mr. Prince and Mr. Brown have multiple depositions and pleading deadlines
 7 arising before the original deadline to file Plaintiff's response to the Motion. The requested extension
 8 of time will allow Plaintiff to comprehensively address the issues raised in the Motion. The Parties'
 9 requested extension is not made in bad faith or to unnecessarily delay these proceedings. Therefore,
 10 the Parties respectfully request the Court approve the foregoing stipulation.

11 DATED this 7th day of February, 2023.

DATED this 7th day of February, 2023.

12 **PRINCE LAW GROUP**

LEWIS BRISBOIS BISGAARD & SMITH

13 /s/ Andrew R. Brown

/s/ Brigitte E. Foley

14 DENNIS M. PRINCE
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 Correct Care Solutions, LLC

19 DATED this 7th day of February, 2023.

20 **LAS VEGAS CITY ATTORNEY'S OFFICE**

21 /s/ John A. Curtis

22 BRADFORD R. JERBIC
 Nevada Bar No. 1056
 23 JOHN A. CURTIS
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 24 495 S. Main Street, 6th Floor
 Las Vegas, Nevada 89101
 25 Attorneys for Defendants
 City of Las Vegas and Michelle Freeman

ORDER

IT IS SO ORDERED.

DATED: February 8, 2023



UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

DATED this 7th day of February, 2023.

PRINCE LAW GROUP

/s/ Andrew R. Brown

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